

Cameron Hall; AZ Bar No. 025177  
Michael Zoldan; AZ Bar No. 028128  
Zachary Price; AZ Bar No. 028464  
**HALL & CHELLE LAW, LLC**  
7400 E. Pinnacle Peak Rd. # 204  
Scottsdale, AZ 85255  
Tel & Fax: 480.422.4529  
Cameron@Hall-Chelle.com  
Michael@Hall-Chelle.com  
ZPrice@Hall-Chelle.com  
Docketing@Hall-Chelle.com

Attorneys for Plaintiff  
Tracy Rexroat

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

## **Tracy Rexroat,**

**Plaintiff,**

v.

**Arizona Department of Education;  
and, State of Arizona, State Board of  
Education.**

## Defendant.

**Case No: 2:11-cv-01028-PHX-PGR**

**EX PARTE MOTION TO WITHDRAW  
AS COUNSEL**

(Assigned to the  
Hon. Paul G. Rosenblatt)

Pursuant to LRCiv 83.3(b), Federal Rule of Civil Procedure and Ethical Rules 1.4 and 1.16, attorney Michael Zoldan and Hall & Chelle Law, LLC hereby move to this Court to withdraw as counsel for Plaintiff Tracy Rexroat (“**Rexroat**”).

Rexroat's consent to this withdrawal is provided below. Rexroat has been notified in writing of the status of this case, including the dates and times of any court hearings or trial settings, pending compliance with any existing court orders, and the possibility of

1 sanctions.

2 The last known address and telephone number for Rexroat is as follows:

3  
4 Tracy Rexroat  
5 3308 N. 39<sup>th</sup> Ave.  
6 Phoenix, AZ 85019  
(602) 716-1172

7 Rexroat has been informed that she is responsible for the ongoing conduct of these  
8 proceedings and must abide by all Rules and existing Court Orders at penalty of sanction.  
9 Because trial for this matter will not commence for almost three months, Rexroat will  
10 have adequate time to secure alternate counsel, and will not be prejudiced by counsel's  
11 withdrawal.

12 THEREFORE, counsel respectfully requests that this Court issue the proposed  
13 Order filed concurrently herewith.

14  
15  
16 DATED May 4, 2012.  
17

18 **HALL & CHELLE LAW, LLC**  
19

20 By: /s/ Michael Zoldan  
21 7400 E. Pinnacle Peak Rd., Suite 204  
22 Scottsdale, Arizona 85255  
23 Attorneys for Plaintiff  
Tracy Rexroat  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2012, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Rachel Bacalzo, Esq.  
Assistant Attorney General  
1275 West Washington  
Phoenix, Arizona 85007  
Telephone: (602) 542-7750  
[Rachel.Bacalzo@azag.gov](mailto:Rachel.Bacalzo@azag.gov)

Copy of the foregoing sent via mail  
And email this May 4, 2012 to:

Tracy Rexroat  
3308 N. 39<sup>th</sup> Ave.  
Phoenix, AZ 85019

/s/ Morgan Sullivan

HALL & CHELLE LAW, LLC

7400 E. Pinnacle Peak Rd., Suite 204, Scottsdale, AZ 85255  
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